UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

IN RE RESIDENTIAL CAPITAL, LLC, et al.,

Debtors.

Case No. 12-12020 (MG) Chapter 11 Jointly Administered

Objection Date: May 21, 2019@ 4:00 pm. (ET) Hearing Date: May 28, 2019 @ 11:00 am. (ET)

CERTIFICATE OF NO OBJECTION TO MOTION AND INCORPORATED MEMORANDUM OF LAW OF THE *ROTHSTEIN* PLAINTIFFS (CLAIM NOS. 4074 AND 3966) TO AUTHORIZE DISTRIBUTION OF THE NET <u>SETTLEMENT FUND TO ELIGIBLE CLASS MEMBERS</u>

Landon Rothstein, Jennifer Davidson, Robert Davidson, and Ihor Kobryn, individually and on behalf of the putative class (collectively, the "Rothstein Plaintiffs" or "Plaintiffs") (Claim Nos. 4074 and 3966), hereby submits this Certificate of No Objection to *Motion and Incorporated Memorandum of Law of the Rothstein Plaintiffs (Claim Nos. 4074 and 3966) to Authorize Distribution of the Net Settlement Fund to Eligible Class Members* (the "Certificate"), pursuant to Local Bankruptcy Rule 9075-2, and respectfully states:

- 1. On May 3, 2019, the Motion and Incorporated Memorandum of Law of the Rothstein Plaintiffs (Claim Nos. 4074 and 3966) to Authorize Distribution of the Net Settlement Fund to Eligible Class Members was filed as Document Number 10634 (the "Motion").
- 2. Notice of the Motion was provided by First Class United States Mail and via ECF to parties and claimants listed in the Certificate of Service attached to the Motion.
- The deadline for filing an objection or response to the Motion expired on May 21,
 (the "Objection Deadline").
- 4. The Objection Deadline has now passed and counsel has reviewed the case docket note less than 48 hours after expiration of the Objection Deadline, and is not aware of any

objections, responsive pleadings or request for hearing with respect to the Motion have been filed with the clerk or served on counsel for the Plaintiffs.

5. The Plaintiffs respectfully request that the Court enter an order granting the Motion without further pleading or hearing. A copy of the proposed Order that was attached to the Motion, is submitted with this Certificate.

Dated: May 23, 2019 New York, NY Respectfully submitted,

KIRBY McINERNEY LLP

By: /s/ Mark A. Strauss
Mark A. Strauss
250 Park Avenue, Suite 820
New York, NY 10177

Tel: (212) 371-6600 Fax: (212) 751-2540